

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

July 31, 2018

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

We write to Your Honor on behalf of Plaintiffs' Executive Committees to request short extensions for the PECs' responses to three related applications currently due this week. Defendants Al-Obaid, Al-Turki, Basha, and Naseef ("the Charity Officials") filed a motion for reconsideration (ECF No. 4064, filed July 20, 2018); the Charity Officials also filed an application for a protective order (ECF No. 4073, filed July 27, 2018), and Al-Buthe filed an application for a protective order (ECF No. 4074, filed July 30, 2018). We understand that the PECs' responses are due August 3, August 1, and August 2, respectively. For various reasons, including conflicting schedules on the part of members of the PECs, the short response times for each of the three applications, and in order to facilitate coordinated responses regarding the related applications, the PECs are asking to extend the response date for each of the three applications to a single date on Wednesday, August 8, 2018. We have conferred with Alan Kabat, counsel for all of these defendants, and he has indicated that he does not oppose the request. If requested by defendants, we would consent to additional time for their reply briefs.

Respectfully,

/s/ Robert T. Haeefe
ROBERT T. HAEFELE
PLAINTIFFS' EXECUTIVE COMMITTEES

cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF